
United States District Court
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN DOUGLAS KNIGHT,

Defendant.

CRIMINAL COMPLAINT

Case No. 21-MJ-195-KEW

I, Special Agent Steve West, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about May 30, 2015, in the Eastern District of Oklahoma, within Indian Country, defendant, **JOHN DOUGLAS KNIGHT**, committed the crime of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, 1153 and 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Steve West, which is attached hereto and made a part hereof by reference.

☒ Continued on the attached sheet.

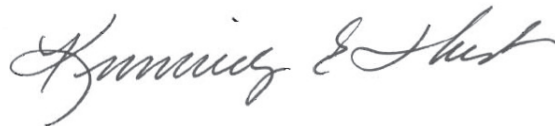


Special Agent Steve West
Federal Bureau of Investigation
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: April 26, 2021

UNITED STATES MAGISTRATE JUDGE
Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT

I, Special Agent Steve West, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since September of 2004. I have been employed as a Special Agent of the FBI for approximately sixteen (16) years. I am currently assigned to the Oklahoma City Division, Ardmore RA. During my employment with FBI, I have investigated numerous Indian Country death, assault, and sexual abuse cases, in violation of Title 18, United States Code, Sections 1151, 1152, 1153 and 2, and the Major Crimes Act ("MCA").

2. As a federal agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements contained in this Affidavit are based in part on: information provided by other agencies; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. As your affiant, I am familiar with the United States Supreme Court's Opinion, *McGirt v. Oklahoma*, issued on July 9, 2020, as well as subsequent opinions issued by the OCCA related to *McGirt*. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that **JOHN DOUGLAS KNIGHT** committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

FACTS IN SUPPORT OF PROBABLE CAUSE

4. As will be shown below, there is probable cause to believe that **JOHN DOUGLAS KNIGHT** committed Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, 1153 and 2. In support of this Affidavit, I submit the following:

5. VENUE & JURISDICTION: the facts and circumstances alleged in this affidavit occurred within the Eastern District of Oklahoma. More specifically, the below described location of the crime is within the geographic boundaries of the Seminole Nation Indian Reservation.

6. DEFENDANT: the defendant is **JOHN DOUGLAS KNIGHT**, hereinafter referred to as **KNIGHT**. **KNIGHT** is a recognized member of the Seminole Nation.

7. BACKGROUND: on or about May 30, 2015, **KNIGHT** shot and killed Scotty Candler ("Candler") at his residence. Candler's residence was a brown storage building located seven miles from Konawa and seven miles from Maud within the boundaries of the Seminole Nation Indian Reservation.

8. On April 19, 2017, M.A. informed law enforcement that he was present when a white male subject shot and killed Candler in 2015. Candler was shot in the face while on his bed. M.A. and the white male went to Candler's residence with the intent to ask questions. M.A. and the white male were just going to point guns at Candler and scare him. M.A. and the white male knocked on the door and when it opened, two pit bull dogs came outside after M.A. Shortly thereafter, M.A. heard a gunshot.

9. On April 21, 2017, M.A. identified **KNIGHT**, aka Cuzzo, as the white male subject with him in 2015 when Candler was shot and killed. M.A. informed law enforcement that he and **KNIGHT** were given orders by the Indian Brotherhood ("IBH") to go to Candler's residence and question him about the murder of Joseph Bounds and Summer Gokey. M.A. was given orders to watch over **KNIGHT** during the incident. J.A. drove to the area where Candler lived and dropped

them off. M.A. and KNIGHT were both armed. KNIGHT banged on the outside walls of Candler's residence in attempt to get him to come outside, but Candler never did. KNIGHT then went to the front door and knocked on it. As Candler opened the front door, two dogs came out of the house after M.A. KNIGHT went inside the house and shot Candler in the head. After the shooting, M.A. saw Candler lying on the bed twitching. M.A. and KNIGHT fled the scene.

10. On September 07, 2017, J.A. informed law enforcement that in 2015, M.A. and Cuzzo/KNIGHT came to his residence. M.A. and Cuzzo/KNIGHT needed a ride to Konawa to scare, threaten, and pistol whip a guy who was involved with a homicide behind Wal-Mart in Seminole. M.A. had a rifle and Cuzzo/KNIGHT had a pistol. J.A. dropped them off at the intersection of Old Highway 99 and County Road EW 1340 in Seminole County. Several hours later, J.A. was called to come back and pick them up. J.A. picked them up at the same intersection where he dropped them off. When M.A. and Cuzzo/KNIGHT got back into the car, neither of them had their firearms and stated they had gotten rid of them. M.A. stated he stayed outside while Cuzzo/KNIGHT went inside and shot the guy. According to J.A., M.A. got patched into the IBH and Cuzzo/KNIGHT got his prospect into the IBH once Candler was killed.

11. A medical examiner conducted an autopsy of Candler and determined Candler died of a gunshot wound and the manner of death was homicide.

CONCLUSION

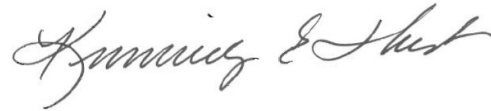
12. Based on a review of this case and based on my knowledge and experience with violent crimes in Indian Country, I, as your Affiant have probable cause to believe **JOHN DOUGLAS KNIGHT** committed the offense of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, 1153 and 2.

Respectfully Submitted,



STEVE WEST
Special Agent
Federal Bureau of Investigation

Sworn before me this 26th day of April, 2021.



UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF OKLAHOMA